

From: [Carroll, Craig](#)
To: [Coleman, Sam](#); [Edlund, Carl](#)
Cc: [Martin, John](#); [Foster, Althea](#); [Bernier, Roberto](#); [Carroll, Craig](#); [R6HarveyREOC](#); [Smith, Monica](#)
Subject: Arkema Response Information and Plan
Date: Thursday, August 31, 2017 3:27:53 AM
Attachments: [Region 6 E.O. Standard Operating Procedures -- Combined \(FINAL\) -- 08-03....pdf](#)
[Potential Sources of Support During HAZMAT Incident -- 10-19-2015.pdf](#)
[CFATS Emergency Orders.docx](#)

Attached are:

- Excerpt from Section 624 of the Chemical Facility Anti-Terrorism Standards (CFATS)
- Region 6 Executive Order 13650 – Chemical Safety and Security Workgroup Standard Operating Procedures
- Final Standard Operating Procedure (6): Contact Guide for Chemical Information for First Responders

The “Emergency Orders” under the above section of CFATS might lead someone to believe DHS is in charge of the response if it has issued an emergency order to the facility. However, I have seen nothing to indicate DHS has issued such an order at this time. I found nothing in the attached Region 6 EO 13650 SOPs to indicate DHS is in charge of the site. I also saw no indication of this in today’s afternoon update nor on the only webpage I could find for a response by Greg Fife (https://response.epa.gov/site/site_profile.aspx?site_id=8121) similar to the one you mentioned. Please send us your source so Althea and I can continue to look into the issue.

- I have attached the “Potential Sources of Support During a Hazmat Event” card required by the Region 6 SOP for your reference.
- Contact information we have for the Harris County Judge is: Honorable Edward M. Emmett – (713)755-4000

Status of and Response Plans for the Arkema Facility

The Arkema Plant in Crosby, TX produces liquid organic peroxides. The plant is inundated with flood waters and has been evacuated of all personnel. Plant personnel are remotely monitoring the temperature of the trailers. Three (3) of the trailers still have operating cooling systems. The remaining 5 trailers lost their cooling system. In 3 of the 5 trailers that lost their cooling systems, the temperature remains in the safe zone. On the remaining 2 trailers, the facility personnel have lost the ability to monitor and do not know the temperature.

The EPA Hurricane Harvey Operations personnel put together air and water models for two

potential scenarios: 1) a decomposition and meltdown with a large quantity of peroxides being released into surface waters at the plant and 2) an explosion/fire of one or multiple trailers. OSC Bill Rhotenberry spoke several times on 8/30/17 with David Wade, Harris County Office of Emergency Management (713-545-9299) about the incident to maintain situational awareness. The Harris County Hazmat and Fire Department is monitoring the situation with the USCG. Due to health and safety concerns Harris County Fire Department has adopted a defensive posture at the facility and is maintaining a 1.5-mile evacuation radius around the facility. The EPA ASPECT aircraft completed its initial overflight of the facility on 8/30/17 to gather infra-red and photographic imagery. No vapors were detected migrating from the site and no thermal abnormalities were detected on the overflight. Arkema estimates the first trailer could reach auto ignition temperatures within the next 24 hours. ASPECT will conduct an overflight of the facility again tomorrow as part of its reconnaissance activities. Should a release/fire occur, ASPECT will be diverted to collect information about the concentration of chemicals in the smoke cloud if it is flying elsewhere at the time of the event. OSC Roberto Bernier and a technical assistance contractor will be in the Houston area tomorrow and will integrate into unified command with State and local responders monitoring the situation. If a release occurs, firefighting activities will be conducted by local responders. OSC Bernier will conduct air monitoring for the Harris County Fire Department as needed. OSC Bernier may also conduct water testing and sampling if appropriate. All of these response actions are dependent on the ability to safely access areas around the facility.

Craig Carroll,
Chief, Emergency Management Branch
214-665-2220